UPDATE

OSHA Recordkeeping Requirements

OSHA Injury and Illness Recordkeeping and Reporting – Post Form 300A by February 1

Many employers having more than 10 employees are required to keep a record of work-related injuries and illnesses, (OSHA Logs). All establishments subject to this requirement must complete and post the OSHA Annual Summary Form 300A, even if no work-related injuries or illnesses occurred during the calendar year.

Are you partially exempt from the recordkeeping and reporting requirements?

Employers in certain low risk industries are exempt from these requirements unless OSHA, the BLS, or the Division of Occupational Safety and Health asks them to do so. Follow these steps to determine if you qualify for the partial exemption:

- Determine your NAICS, and identify the first 4 numbers.
- Review the Exception Table - If your first 4 numbers appear on the table, your company is exempt unless otherwise required.

Posting Requirement - By February 1 of each year you must:

- Review the 300 Log to verify the entries are complete and accurate.
- Complete the Summary Form 300A utilizing the information recorded on the 300 Log.
- A company executive must certify and date the 300A Summary Form.
- Post the Annual Summary from February 1 to April 30 of the year following the year covered.
  - You must post a copy in each establishment in a conspicuous place or places where notices to employees are customarily posted.
  - You must ensure the posted 300A is not altered, defaced or covered by other material.

Electronic Submission Requirements (if applicable):

The electronic filing requirement applies to the below listed establishments:

- Establishments with 20 to 249 employees in specific industries with higher instances of injuries or illnesses must submit the information from the Form 300A electronically. Review a Full List of these industries.
- Establishments with 250 or more employees required to keep OSHA injury and illness records must submit the information from the Form 300A electronically.
- Upon notification, you must electronically submit the requested information from your OSHA injury and illness records to OSHA or OSHA's designee.

Note: Employers can find instructions for registering and recording the 300A data on OSHA's ITA webpage. Establishments have to submit the required information by March 2 of the year after the calendar year covered.

***NEW Additional Requirements for Employers with over 100 Employees

On July 17, 2023, OSHA announced a final rule that will require certain employers in designated high-hazard industries to electronically submit additional injury and illness information than what is currently requires but employers are already required to keep. This rule became effective on January 1, 2024 and applies to your 2023 submission.

The final rule includes the following submission requirements:

- Establishments with 100 or more employees in certain high-hazard industries must electronically submit information from their Form 300, Log of Work-Related Injuries and Illnesses, and Form 301, Injury and Illness Incident Report, to OSHA once a year. These submissions are in addition to the submission of Form 300A, Summary of Work-Related Injuries and Illnesses; and
- Establishments are required to include their legal company name when making electronic submissions to OSHA from their injury and illness records to improve data quality.

The final rule retains the current requirements for electronic submission of Form 300A information from establishments with 20-249 employees in certain high-hazard industries and establishments with 250 or more employees in industries that must routinely keep OSHA injury and illness records.

Resources

[OSHA Recordkeeping - Overview | Occupational Safety and Health Administration](#)

[Cal/OSHA - Brief Guide to Recordkeeping Requirements](#)

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*If you have 10 employees or less, you are exempt, unless requested by OSHA or the Bureau of Labor Statistics (BLS) to maintain these logs.

If you have any questions or need assistance email us at RiskControl@MarshMMA.com